

February 24, 2021

Via ECF

Honorable James J. Garrity, Jr.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

RE: *In re Orly Genger*, Case No.: 19-13895-jlg

Dear Judge Garrity:

The undersigned are counsel for TPR Investment Associates, Inc. (“**TPR**”) and Deborah Piazza, as Chapter 7 Trustee (the “**Trustee**”). As Your Honor is aware, on July 30, 2020, TPR filed a motion for an order confirming that the automatic stay does not limit the ability of the New York State Court to exonerate an undertaking (the “**Motion**”) (Docket No. 322). TPR filed a Statement in response to the Motion (Docket No. 357) on February 18, 2021 indicating that it did not object to the Motion, but requesting certain provisions be included in the order approving the Motion. No other party objected to or otherwise took a position with respect to the Motion.

TPR and the Trustee have agreed on the attached form of order (the “**Proposed Order**”). TPR and the Trustee are prepared to attend the hearing on February 25, 2021 in connection with the Motion, but would otherwise also be amenable to the Court’s entry of the Proposed Order without a hearing to the extent the Court deems it appropriate. If Your Honor has any questions concerning the Proposed Order, please do not hesitate to contact either of the undersigned.

Respectfully submitted,

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cc: All Counsel of Record (via ECF)